REMARKS

In the Office Action¹, the Examiner rejected claims 1 and 3-37 under 35 U.S.C. §103(a) as being anticipated by U.S. Patent 6,169,984 to Bogdan et al. ("Bogdan").

Applicant amends claims 1, 3-9, 12-14, 18, 20-23, and 26-28; and cancels claim 19. Claims 1, 3-18, and 20-37 are pending in the application. Support for the claim amendments can be found at, for example, page. 6, line. 20 - page. 7, line. 8; page. 8, line. 23 - page. 9, line. 25 of the as-filed specification.

Applicant respectfully traverses the rejection of the pending claims under 35 U.S.C. § 102 as anticipated by <u>Bogdan</u>.

Amended independent claim 1 recites a computer program product comprising instructions for, among other things,

at application run time, grouping the user interface elements ... according to characters contained in text labels associated with the user interface elements . . .

when the user navigation input is the forward user navigation input . . . input focus is shifted in the forward direction to a next user interface element in the current group https://hatto.com/hat

when the user navigation input is the backward user navigation input . . . input focus is shifted <u>in the reverse</u> <u>direction</u> to a previous user interface element in the current group <u>having an associated text label matching the group identifier key press</u> if the current group is the same as the target group

(emphasis added). <u>Bogdan</u> fails to disclose or suggest at least these features of amended claim 1.

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Bogdan discloses, "[a] user interface control implementing a global keyboard navigation system by way of printable keyboard character input to extend an incremental type search across all window components within a defined scope."

Abstract. In Bogdan, the user interface elements are grouped hierarchically into containers. See, e.g., col. 5, Il. 27-35. The container grouping, however, is not "according to characters contained in text labels associated with the user interface elements," as recited by amended independent claim 1. Bogdan only discloses that the containers are "organized hierarchically and can be referred to more generically as parent components and child components." Col. 5, Il. 32-35.

Moreover, in <u>Bogdan</u>, "a recursive search of all parent and child generations occurs to find a match between the first character of keyboard input from the user and the first character of a component name." Col. 7, II. 27-30. However, "[t]he recursive search begins with the present component's children and [moves] <u>down through the generations of the children's children</u>." Col. 8, II. 44-46 (emphasis added). In other words, <u>Bogdan</u> only searches in <u>one</u> direction. In contrast, amended independent claim 1 recites, "when the user navigation input is the <u>forward</u> user navigation input . . . input focus is shifted <u>in the forward direction</u> to a next user interface element in the current group <u>having a text label containing characters matching the group identifier key press</u>," and "when the user navigation input is the <u>backward</u> user navigation input . . . input focus is shifted <u>in the reverse direction</u> to a previous user interface element in the current group <u>having an associated text label matching the group identifier key press</u>" (emphasis added).

At page 9 of the Office Action and in the Advisory Action, the Examiner asserts that <u>Bodgen</u> discloses both forward and backward navigation, and cites to various portions of <u>Bogdan</u> for support. The cited portions, however, do not disclose the claimed "forward user navigation input" and "backward user navigation input."

For example, the discussion in col. 5, II. 58-62 only indicates that the <u>scope</u> of the search is limited to the container 250, and mentions nothing about "forward user navigation input" and "backward user navigation input." At col. 7, II. 1-53 <u>Bogdan</u> discusses the recursive search that, as discussed above, is <u>one-directional</u>, because it "begins with the present component's children and [moves] <u>down through the generations of the children's children</u>." Col. 8, II. 44-46 (emphasis added). Col. 8, II. 21-32 merely indicates that the user's selection of the ALT breaks the scope of the current search, and causes the input focus to be redirected to the top level component. At col. 10, II. 25-53 <u>Bogdan</u> indicates that the user can search for multiple occurrences of a component having the same prefix by typing the last letter of the prefix multiple times.

Accordingly, contrary to the Examiner's suggestion, <u>Bogdan</u> fails to disclose or suggest "forward user navigation input" and "backward user navigation input," much less that "when the user navigation input is the <u>forward</u> user navigation input . . . input focus is shifted <u>in the forward direction</u> to a next user interface element in the current group <u>having a text label containing characters matching the group identifier key press</u>," and that "when the user navigation input is the <u>backward</u> user navigation input . . . input focus is shifted <u>in the reverse direction</u> to a previous user interface element in the current group <u>having an associated text label matching the group identifier key press</u> . . . " (emphasis added), as recited by amended independent claim 1. Indeed, Bogdan

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explicitly states that recursive search moves in one direction, "down through the generations of the children's children." Col. 8, II. 44-46 (emphasis added).

For at least the above reasons, amended independent claim 1 is allowable over <u>Bodgen</u>. Amended independent claims 9, 13, 18, 23, and 27, while of different scope, are allowable over <u>Bogdan</u> for at least similar reasons as claim 1. The remaining claims depend from one of the independent claims, and are therefore also allowable over Bogdan.

In view of the foregoing, Applicant respectfully requests reconsideration of this application, the withdrawal of the rejections, and the timely allowance of the pending claims. If the Examiner believes a telephone conference would be useful in resolving any outstanding issues, the Examiner is kindly invited to contact the undersigned at 202.216.5118.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P.

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Jámes D. Stein Reg. No. 63,782 202.216.5118